

St. Louis County ( )  
Nesco Container Corporation

RECEIVED

JUN 23 1997

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

RCRA PERMITTING & COMPLIANCE BRANCH  
(RRCB)  
Mel Carnahan, Governor • David A. Shott, Director

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office

10805 Sunset Office Drive, Suite 100 St. Louis, MO 63127-1017

(314)822-0101

FAX (314)822-0943

mo1006275036

April 25, 1997

Mr. John H. Vogt  
Purchasing & Environmental Mgr.  
Nesco Container Corporation  
2391 Cassens Drive  
Fenton, MO 63026-2502

RECEIVED

APR 28 1997

HAZARDOUS WASTE PROGRAM  
MISSOURI DEPARTMENT OF  
NATURAL RESOURCES

Dear Mr. Vogt:

On April 17, 1997, a hazardous waste inspection was conducted at Nesco Container Corporation in Fenton, Missouri by Vickie Heberlie, under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended.

Please review the enclosed Inspection Record and Checklist. There were no unsatisfactory features noted as a result of the inspection and no response is required from you at this time.

Should you have any questions regarding the checklist, please call Ms Heberlie at (314) 822-0101.

Sincerely,

ST. LOUIS REGIONAL OFFICE

*Robert S. P. Eck*

Robert S. P. Eck  
Regional Director

RSPE/VLH/jh  
VLH

Enclosure

c: Hazardous Waste Program ✓



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
HAZARDOUS WASTE PROGRAM  
LARGE QUANTITY GENERATOR  
INSPECTION RECORD AND CHECKLIST

RECEIVED

APR 28 1997

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LQG-INSP.

FOR FACILITIES THAT GENERATE/ACCUMULATE > 1000 Kg (2,200 lbs. or approximately 5 drums)

NAME <b>Nesco Container Corporation</b>	DATE <b>4-17-97</b>	EPA I.D. NUMBER <b>MO0006275036</b>
ADDRESS <b>2391 Cassens Drive</b>	RR NO. <b>na</b>	MO I.D. NUMBER <b>001372</b>
CITY <b>Fenton</b>	NUMBER OF EMPLOYEES <b>~65</b>	TELEPHONE NUMBER <b>(314) 343-7300</b>
YEARS AT SITE <b>~3 1/2</b>		

FACILITY REPRESENTATIVE(S), TITLE(S)

**Glen Lackey, Dir. of Operations ; John Vogt, Purchasing ; Env. Manager**

DESCRIPTION OF THE FACILITY'S OPERATIONS AND PLANT.

Nesco Container Corporation is a manufacturer of steel drums which range in size from 12 - 90 gallons. Nesco receives coils of steel which are cut into sheets or discs. Steel sheets are welded (becomes circular shell), cleaned and phosphatized with iron. Sheets and/or discs may go through interior coating process to prevent corrosion. Discs are then seamed to the shell which makes a drum. Drums are then painted either with roll-on or spray gun. MEK and Xylene are used to thin paint, clean lines, equipment and spray guns. Drums are baked and then shipped.

\* Based on findings at facility, NESCO is a large quantity generator of hazardous waste.

WASTE STREAMS

DESCRIBE EACH WASTE STREAM GENERATED INCLUDING THE PRODUCTION PROCESS	GENERATION RATE	EPA ID NUMBER	DISPOSITION
1. Waste Paint Related Material	Approx. 500 G/month	D001, D035, F003, F005	Rineco (Fuel Blending)
2. Non-Hazardous Used Oil	—	—	—
3. Non-Hazardous Phosphate Sludge	—	—	Laidlaw Special Waste LF
4. Shop Towels: used for clean-up	—	—	Laundered by Norman



R00064162

RCRA Records Center

CHECK ALL THAT APPLY (Specify if possible)

- |                                       |   |
|---------------------------------------|---|
| <input type="checkbox"/> NPDES Permit | <input type="checkbox"/> Lead/Acid Batteries          |
| <input type="checkbox"/> Septic Tank  | <input type="checkbox"/> H.W. Burner/Blender/Marketer |
|                                       | <input type="checkbox"/> Solid Waste Landfill         |

## A. GENERAL

1	<input type="checkbox"/> Registered as a HW Generator - Section 260.380.1 (1) RSMo and 10 CSR 25-5.262 (2)(A)	GGR
2	<input type="checkbox"/> Facility determines if waste is hazardous - 10 CSR 25-5.262(1) incorporating 40 CFR 262.11	GGR
3	<input type="checkbox"/> Utilizes a licensed hazardous waste transporter - Section 260.380.1 (5) RSMo	GGR
4	<input type="checkbox"/> Utilizes authorized HW TSD or RR facility - Section 260.380.1(7) RSMo	GGR
5	<input type="checkbox"/> Facility does not operate as a TSD - Section 260.390(1) RSMo	GGR

COMMENTS

## PART 1: WALK-THROUGH INSPECTION

## B. PRETRANSPORT, CONTAINERIZATION & STORAGE

1	<input type="checkbox"/> Storage does not exceed 90 days or 180/270 days if facility generates > 1000 Kg/month - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)	GPT
2	<input type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a) referencing 40 CFR 265.171	GPT
3	<input type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.172	GPT
4	<input type="checkbox"/> Containers closed in storage - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)	GPT
5	<input type="checkbox"/> Containers storing incompatible waste separated or protected from each other by a dike, berm or wall - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.173(a)	GPT
6	<input type="checkbox"/> Container storage areas have a containment system if holding more than 1000 Kg of liquid hazardous waste - 10 CSR 25-5.262 (2)(C)2.B.(1)	GOR
7	<input checked="" type="checkbox"/> Base of containment system is impervious and free of cracks or gaps - 10 CSR 25-5.262 (2)(C)2.B.(III)(a).	GOR
8	<input checked="" type="checkbox"/> Containers protected from contact with accumulated liquids - 10 CSR 25-5.262(2)(C)2.B.(III)(b).	GOR
	<input checked="" type="checkbox"/> Capacity of containment system = 10% of waste volume or volume of largest container, whichever is greater - 10 CSR 25-5.262(2)(C)2.B.(III)(c).	GOR
10	<input checked="" type="checkbox"/> Run-on onto the containment system is prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.B.(III)(d).	GOR
11	<input checked="" type="checkbox"/> Accumulated liquids removed to prevent overflow of containment - 10 CSR 25-5.262(2)(C)2.B.(III)(e).	GOR
12	<input checked="" type="checkbox"/> Containers of ignitable or reactive waste stored >50 ft. from property line (or meet requirements) - 10 CSR 25-5.262(2)(C)5. referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(I)7.and 8.	GPT
13	<input checked="" type="checkbox"/> Containers clearly marked "hazardous waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
14	<input checked="" type="checkbox"/> Waste packaged/labeled/marked per DOT during entire on-site storage period - 10 CSR 25-5.262(2)(C)1.	GOR
15	<input checked="" type="checkbox"/> Date of accumulation marked on containers - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)	GPT
16	<input checked="" type="checkbox"/> Facility inspected and maintained (weekly) - 10 CSR 25-5.262(2)(C)2.A.(I) and (II) referencing 40 CFR 265.174	GPT
17	<input checked="" type="checkbox"/> Daily inspection of areas subject to spills, i.e., waste handling areas - 10 CSR 25-5.262(2)(C)2.A.(II)	GOR
18	<input checked="" type="checkbox"/> Adequate aisle space is available - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.35	GPT
19	<input checked="" type="checkbox"/> Placards available for transporter - 10 CSR 25-5.262(1) incorporating 40 CFR 262.33	GPT
20	<input checked="" type="checkbox"/> "No Smoking" signs conspicuously placed by ignitable or reactive wastes - 10 CSR 25-5.262(2)(C)2.D(II)	GOR
21	<input checked="" type="checkbox"/> Waste oil containers in good condition, labeled and closed - 10 CSR 25-11.010(3)(C)	GOR

COMMENTS

## C. SATELLITE ACCUMULATION

<input type="checkbox"/> Containers kept closed - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1)(ii) referencing 40 CFR 265.173(a)	GPT
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COMMENTS

2	<input checked="" type="checkbox"/> Containers in good condition - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1)(i) referencing 40 CFR 265.171	GPT	COMMENTS
3	<input checked="" type="checkbox"/> Waste compatible with container - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1)(ii) referencing 40 CFR 265.172	GPT	
4	<input checked="" type="checkbox"/> Quantities accumulated not exceeding 55 gal. (1 quart of acutely hazardous wastes) - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1)(i)	GPT	
5	<input checked="" type="checkbox"/> Satellite containers go to storage within 3 days of filling - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(2)	GPT	
6	<input checked="" type="checkbox"/> Container marked identifying contents & beginning date - 10 CSR 25-5.262(2)(C)3.	GOR	
7	<input checked="" type="checkbox"/> Stored in satellite areas less than 1 year - 10 CSR 25-5.262(2)(C)3.	GOR	

#### D. PREPAREDNESS AND PREVENTION AND EMERGENCY PROCEDURES

1	<input checked="" type="checkbox"/> Facility operated and maintained to minimize the possibility of an emergency - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1)(i) referencing 40 CFR 265.31	GPT	COMMENTS
2	<input checked="" type="checkbox"/> Adequate and proper spill control, decontamination and safety equipment available (fire blankets, respirators, SCBA, absorbents, etc.) - 10 CSR 25-5.262 (2)(C)2.E.	GPT	
3	<input checked="" type="checkbox"/> Adequate water supply and fire control equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(c) & (d)	GPT	
4	<input checked="" type="checkbox"/> Device in the hazardous waste operation area capable of summoning emergency assistance - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.34(a)	GPT	
5	<input checked="" type="checkbox"/> Telephone or two-way radio on-site and capable of summoning local fire or police department - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.32(b)	GPT	
6	<input checked="" type="checkbox"/> Communication and emergency equipment tested and maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.33	GPT	

#### LQG TANKS

TANK DESIGNATION	CONTENTS	CAPACITY	CONTAINMENT	AGE
1.				
2.	* na in this section *			
3.				
4.				
5.				

1	<input checked="" type="checkbox"/> Spill prevention controls in place and operating e.g. check valves, dry disconnect couplings - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)(1)	GPT	COMMENTS
2	<input checked="" type="checkbox"/> Overflow prevention controls in place and operating e.g. high level alarms, automatic feed cutoff, etc. - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(b)(2)	GPT	
3	<input checked="" type="checkbox"/> Sufficient headboard in uncovered tanks to prevent overtopping - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)(3)	GPT	
4	<input checked="" type="checkbox"/> Waste or treatment method compatible with tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)	GPT	
5	<input checked="" type="checkbox"/> Incompatible wastes not placed in same tank - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)	GPT	
6	<input checked="" type="checkbox"/> Ignitable or reactive wastes rendered safe/protected from sources of ignition or reaction - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)(1) and (2)	GPT	
7	<input checked="" type="checkbox"/> Ignitable or reactive wastes treated/stored in accordance with NFPA's buffer zone requirements - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(b)	GPT	

8	<input type="checkbox"/> Volatiles with vapor pressure > 76 mm @ 25 °C not placed in open tanks - 10 CSR 25-5.262(2)(C)2.B.(i)	GOR
9	<input type="checkbox"/> Wastes and residues removed as hazardous waste and tank and equipment decontaminated upon closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.197(a)	GPT
10	<input type="checkbox"/> Secondary containment system provided for tanks and equipment installed after July 14, 1986, storing flammable waste over 15 years old or unknown age in facility over 15 years old repaired, replaced or reinstalled after July 14, 1986 - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(a)	GPT
11	<input type="checkbox"/> Secondary containment system constructed of or lined with impervious waste compatible material - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(1)	GPT
12	<input type="checkbox"/> Containment system supported by base capable of preventing failure due to settlement, compression or uplift - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(2)	GPT
13	<input type="checkbox"/> Containment system provided with a leak detection system capable of detecting a release within 24 hours - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(3)	GPT
14	<input type="checkbox"/> Containment system sloped or designed to drain and remove liquids - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(b)	GOR
15	<input type="checkbox"/> Containment system capable of containing 100% of the capacity of the largest tank - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(c)	GOR
16	<input type="checkbox"/> Containment system free of cracks or gaps - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(a)	GOR
17	<input type="checkbox"/> Run-on onto containment system prevented or excess capacity is provided - 10 CSR 25-5.262(2)(C)2.C. referencing 10 CSR 25-5.262(2)(C)2.B.(III)(d)	GOR
18	<input type="checkbox"/> Spilled or leaked waste and precipitation removed from secondary containment within 24 hours or as soon as possible - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(c)(4)	GPT
19	<input type="checkbox"/> Tanks are clearly labeled or marked "Hazardous Waste" - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3)	GPT
20	<input type="checkbox"/> Daily inspections of overflow/spill control equipment, aboveground portions of tank system, secondary containment, and data gathered from monitoring equipment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(a)	GPT
21	<input type="checkbox"/> Inspection log maintained - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(c)	GPT
22	<input type="checkbox"/> Cathodic protection systems inspected annually, impressed current sources every two months - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.195(b)	GPT
23	<input type="checkbox"/> Detailed written assessment by an independent, qualified, professional engineer for tanks installed after July 14, 1986, prepared and on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.192	GPT
24	<input type="checkbox"/> Written assessment by an independent, qualified, professional engineer prepared and on-site for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.191	GPT
25	<input type="checkbox"/> Leak test, internal inspection or tank integrity exam performed annually and documented, by an independent, qualified, professional engineer for tanks lacking secondary containment - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.193(i)	GPT
26	<input checked="" type="checkbox"/> Leak/spill response resulted in: waste flow stopped immediately; waste removal; containment and removal of visible releases to the environment; notification and report; and repair or closure - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(1) referencing 40 CFR 265.196	GPT

## COMMENTS



## PART 2: RECORDS INSPECTION

### F. MANIFESTS

		COMMENTS
1. <input checked="" type="checkbox"/> Facility uses manifest system - 260.880.1 (6) RSMo, and 10 CSR 25-5.262(2)(B)	GMR	
2. <input checked="" type="checkbox"/> Records maintained for a 3-year period - 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a)	GRR	
3. <input checked="" type="checkbox"/> Generator's MO & EPA I.D. Numbers - 10 CSR 25-5.262(2)(B)	GOR	
4. <input checked="" type="checkbox"/> Manifest document, ID and consecutive shipment numbers - 10 CSR 25-5.262(2)(B)2.A.	GOR	
5. <input checked="" type="checkbox"/> Generator's name, address and phone number - 10 CSR 25-5.262(2)(B)2.	GMR	
6. <input checked="" type="checkbox"/> All transporters' names, phone numbers, MO & EPA I.D.#'s, license plate # - 10 CSR 25-5.262(2)(B)2.	GMR	
7. <input checked="" type="checkbox"/> Designated facility name, address, phone, MO & EPA I.D. #, - 10 CSR 25-5.262(2)(B)2.	GMR	
8. <input checked="" type="checkbox"/> DOT shipping name, Hazard Class and waste I.D. # (RQ - if required) - 10 CSR 25-5.262(2)(B)2.	GMR	
9. <input checked="" type="checkbox"/> Containers, quantity and specific gravity designated - 10 CSR 25-5.262(2)(B)2.	GMR	
10. <input checked="" type="checkbox"/> Manifest signed and dated - 10 CSR 25-5.262(2)(B)2.	GMR	
11. <input checked="" type="checkbox"/> Out of state manifests have all required MO information - 10 CSR 25-5.262(2)(B)4.A.	GOR	
12. <input checked="" type="checkbox"/> Manifest continuation sheets are not used - 10 CSR 25-5.262(2)(B)1.	GOR	
13. <input checked="" type="checkbox"/> Manifest returned within 35 days - or exception report submitted within 45 days - 10 CSR 25-5.262(2)(D)2.C.	GRR	
14. <input checked="" type="checkbox"/> Summary Manifest Reports and manifest copies sent to DNR quarterly - 10 CSR 25-5.262(2)(D)1.	GOR	

### G. LAND DISPOSAL RESTRICTIONS

		COMMENTS
1. <input checked="" type="checkbox"/> Tests, tests or uses knowledge of waste to determine if the waste is restricted from land disposal - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
2. <input checked="" type="checkbox"/> Dilution of waste to meet LDR treatment standards is not occurring - 10 CSR 25-7.268(1) incorporating 40 CFR 268.3(a)	GLB	
3. <input checked="" type="checkbox"/> "Land-Bag" notification/certification, sent with manifests and retained on-site for five years - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
4. <input checked="" type="checkbox"/> Notification/certification includes correct EPA Hazardous Waste number, corresponding treatment standards, manifest number, and waste analysis data - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)	GLB	
5. <input checked="" type="checkbox"/> Waste analysis plan on-site and utilized if generator treats hazardous waste in tanks or containers to meet LDR treatment standards - 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(4)	GLB	

### H. PERSONNEL TRAINING

		COMMENTS
1. <input checked="" type="checkbox"/> Personnel are trained to respond to emergencies including the use of alarm systems, emergency equipment and contingency plan - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(3).	GPT	
2. <input checked="" type="checkbox"/> Employees do not work in unsupervised positions until they have completed the training - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(b)	GPT	
3. <input checked="" type="checkbox"/> Training reviewed annually - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(c)	GPT	
4. <input checked="" type="checkbox"/> Program director trained in hazardous waste management procedures - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(a)(2)	GPT	
5. <input checked="" type="checkbox"/> Personnel training plan on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)	GPT	

6. <input checked="" type="checkbox"/> Gives job title, job description and name of employee filling each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(1) and (2)	GPT	COMMENTS
7. <input checked="" type="checkbox"/> Written description of introductory and continuing training that will be given to each position - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(3)	GPT	
8. <input checked="" type="checkbox"/> Documentation of training completed by personnel - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(d)(4)	GPT	
9. <input checked="" type="checkbox"/> Records of current personnel maintained until facility closure, former employee records maintained for at least three years - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.16(e)	GPT	

#### I. CONTINGENCY PLAN

1. <input checked="" type="checkbox"/> Contingency plan maintained on-site - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(a).	GPT	COMMENTS
2. <input checked="" type="checkbox"/> Plan submitted to local emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.53(b)	GPT	
3. <input checked="" type="checkbox"/> Emergency coordinator on-site or on call - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.55	GPT	
4. <input checked="" type="checkbox"/> Plan describes actions personnel must take in response to fires, explosions or other releases of hazardous waste - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(a)	GPT	
5. <input checked="" type="checkbox"/> Describes arrangements with emergency response agencies - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(c)	GPT	
6. <input checked="" type="checkbox"/> Lists names, addresses and phone numbers (home and office) of emergency coordinators - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
<input checked="" type="checkbox"/> Primary emergency coordinator designated - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(d)	GPT	
8. <input checked="" type="checkbox"/> List emergency equipment including description, location and capabilities - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(e)	GPT	
9. <input checked="" type="checkbox"/> Evacuation plan, if applicable, designates primary and secondary routes and evacuation signal - 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(4) referencing 40 CFR 265.52(f)	GPT	

#### J. WASTE OIL

1. <input checked="" type="checkbox"/> Waste oils managed properly and not disposed or into the environment - 10 CSR 25-11.010(1)(C)	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Used hazardous waste mixed with waste oils handled as a hazardous waste - 10 CSR 25-11.010(1)(C) 2	GOR	
3. <input checked="" type="checkbox"/> Registered as waste oil generator if gen./accum. 220 lb. - 10 CSR 25-11.010(2)(A)	GOR	
4. <input checked="" type="checkbox"/> Written waste oil contract maintained - 10 CSR 25-11.010(4)(C)	GOR	
5. <input checked="" type="checkbox"/> Uses a licensed transporter and receiving facility - 10 CSR 25-11.010(4)	GOR	

#### K. RESOURCE RECOVERY

1. <input checked="" type="checkbox"/> RC certification for energy recovery or treatment of waste oil or hazardous waste on-site - 10 CSR 25-9.020(1)(A) 2	GOR	COMMENTS
2. <input checked="" type="checkbox"/> Still bottoms or RC residues disposed of properly - Section 260.340 (b) RSMo	GOR	
3. <input checked="" type="checkbox"/> Facility is classified as U, R1 or R2 accurately - 10 CSR 25-9.020(3)(A).	GOR	
<input checked="" type="checkbox"/> Facility meets the operating conditions of certification - 10 CSR 25-9.020(30)(E)3.	GOR	
5. <input checked="" type="checkbox"/> Facility has submitted a written request and received approval from the DNR for all changes in operation including closure - 10 CSR 25-9.020(3)(E) 1. and 2.	GOR	

na

6.	<input type="checkbox"/> Facility report submitted to DNR quarterly - 10 CSR 25-9.020(3)(E)6. referencing 10 CSR 25-7.264(2)(E)3.	GOR	COMMENTS
7.	<input type="checkbox"/> Facility maintains a written operating record - 10 CSR 25-9.020(3)(E)5. referencing 40 CFR 264.73(b)(1) & (2) as modified by 10 CSR 25-7.264(2)(E)2.	GOR	
8.	<input type="checkbox"/> Facility has notified EPA and the state that it qualifies for a small quantity on-site burner exemption or has interim status or a permit if it burns hazardous waste on-site - 10 CSR 25-7.266(1) incorporating 40 CFR 266.108 and 40 CFR 266.103.	GOR	
9.	<input type="checkbox"/> R2 facility uses an adequate sampling and analysis plan to assess incoming shipments - 10 CSR 25-9.020(3)(C)1.	GOR	
10.	<input type="checkbox"/> R2 facility maintains a daily log of manifest number, wastes received, disposition of waste and corresponding sampling data - 10 CSR 25-9.020(3)(C)2.	GOR	
11.	<input type="checkbox"/> R2 facility has a written closure plan which meets 40 CFR 264.112 requirements - 10 CSR 25-9.020(3)(C)3.	GOR	
12.	<input checked="" type="checkbox"/> R2 facility provides financial assurance for closure - 10 CSR 25-9.020(3)(C)4.	GOR	

## CHECKLIST KEY

Check the ☒ if in compliance.

Circle the ☐ if not in compliance and provide comment.

N/A = Not Applicable

A shaded item is a serious deviation from the requirements (Class I violation)

An unshaded item is a significant deviation from the requirements (Class II violation unless conditions warrant Class I)

COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN

INSPECTOR'S SIGNATURE

Vickie L. Heberline

DATE

April 17, 1997